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February 15, 1996

Mr. William F. Caton  
Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, DC 20554

EX PARTE  
PRESENTATION

RECEIVED

FEB 15 1996

Dear Mr. Caton:

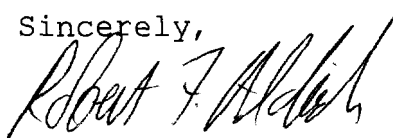
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: Revision of the Commission's Rules to Ensure  
Compatibility With Enhanced 911 Emergency  
Calling Systems, CC Docket No. 94-102

Pursuant to the Commission's rules on ex parte presentations, 47 CFR §1.1206(a), we hereby submit information on behalf of the Multi-Media Telecommunications Association ("MMTA") in the above-referenced docket.

On February 15, 1996, Robert Aldrich of this law firm met with Alan Thomas of the Network Services Division staff. The matters discussed are described in the enclosed material.

Sincerely,



Robert F. Aldrich

enclosure

cc: Alan Thomas

RFA/dkw

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**EX PARTE PRESENTATION -- CC DOCKET NO. 94-102**

**MULTI-MEDIA TELECOMMUNICATIONS ASSOCIATION (MMTA)**

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**FEB 15 1996**

**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY**

- ◆ **SMALL SYSTEM EXEMPTION FROM E911 CPE RULES**
- ◆ **PREEMPTION OF INCONSISTENT STATE  
REQUIREMENTS**

## **SUMMARY**

- ◆ Small systems:  $< \text{ or } = 200$  stations
- ◆ Small system compliance costs are very high
- ◆ Most small systems pose no major location problems
- ◆ FCC should --
  - ◆ Exempt small systems from new Part 68 manufacturer requirements
  - ◆ Exempt small systems customers from providing location ID except in special settings
  - ◆ Allow special-setting customers a choice of location ID method
  - ◆ Preempt state requirements conflicting with these principles

## **COST OF COMPLIANCE**

- ◆ Estimated average cost of small systems = \$350 per station
- ◆ Designing built in location ID capability will take time -- and in short run requires designing for technology viewed as obsolescent (CAMA trunks)
- ◆ Short run solutions generally require costly adjunct equipment (current cost est. \$15,000- \$20,000 per system, plus recurring administrative cost)
- ◆ Additional costs for CAMA trunks are substantial (recurring charge est. \$1,200 per system annually -- more if more than two trunks required). Questions re carriers' ability to engineer, install, and maintain thousands or millions of CAMA trunks.

**CURRENTLY THERE ARE SOME 3 MILLION SMALL SYSTEMS INSTALLED.**

## **NEED FOR REGULATION IS LIMITED**

- ◆ Need for more precise location ID is limited in small-system environment:
  - ◆ Residential PBX-Centrex (e.g., dormitories, apartment buildings)
  - ◆ Multi-location business (e.g., bank branches)
- ◆ Typical small system serving business users on one or a few floors of one building -- does not need to be regulated

## **ILLINOIS LAW TO TAKE EFFECT JUNE 30, 1996:**

"(a) [a new or replacement 'private business switch service'] shall provide to those business end users the same level of 9-1-1 service as the public agency and the telecommunications carrier are providing to other business end users of the local 9-1-1 system. This service shall include, but not be limited to, the capability to identify the telephone number, extension number, and the physical location that is the source of the call to the number designated as the emergency telephone number. . . .

"(b) The private business switch operator is responsible for forwarding end user automatic location identification record information to the 9-1-1 system provider according to the format, frequency, and procedures established by that system provider.

"(c) An Illinois local exchange telecommunications carrier shall file tariffs indicating that as a condition of service to private business switch systems, the systems shall adhere to the requirements of this Act."

50 ILCS 750/15.6

## **OVERLY BURDENSOME STATE REQUIREMENTS:**

- ◆ impose massive and unnecessary compliance costs
- ◆ generate costly litigation among injury victims, employers and equipment and service suppliers
- ◆ lock manufacturers into obsolescent technology
- ◆ complicate the design of CPE for nationwide distribution

## **CONCLUSION**

- ◆ Exempt small systems from new Part 68 manufacturer requirements to small systems
- ◆ Exempt small system customers from providing E911 location ID except in special settings (e.g., residential, multi-site)
- ◆ Allow special-setting customers a choice of location ID method
- ◆ Preempt state requirements conflicting with these principles